

FEDERAL ELECTION COMMISSION

WASHINGTON DIC 20463

RQ-3 December 1, 1994

Jeffrey Michael Alden, Treasurer Stoel Rives Political Action Committee 900 SW 5th Ave. Ste. 2300 Portland, OR 97204

Identification Number: C00289165

Reference: October Quarterly (7/1/94-9/30/94) and 12 Day Pre-General (10/1/94-10/19/94) Reports

Dear Mr. Alden:

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This letter is to inform you that as of November 30, 1994, the Commission has not received your response to our requests for additional information, dated November 2 and 9, 1994.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Stephen Cohen on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson

Assistant Staff Director Reports Analysis Division

Enclosures

Jeffrey Michael Alden, Treasurer Stoel Rives Political Action Committee 900 SW 5th Avenue, Suite 2300 Portland, OR 97204

NOV 9 1994

Identification Number: C00289165

Reference: 12 Day Pre-General Report (10/1/94-10/19/94)

Dear Mr. Alden:

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This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. \$441a(a) precludes a political committee, other than a multicandidate committee, from making a contribution to a candidate for federal office in excess of \$1,000 per election. Please refer to the Campaign Guide for information on how a committee qualifies for multicandidate status.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$1,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the contributor. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CPR \$110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Your report discloses no payments for administrative expenses. Administrative expenses are payments made for purpose of operating a political committee including, but not limited to, rent, utilities, telephone service, office equipment and Any such payments to a person aggregating in salaries, supplies. excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. \$434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. \$433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR \$104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. \$434(b)(3) and 11 CFR \$104.13, and the limitations and prohibitions of 2 U.S.C. \$5441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Stephen Cohen Reports Analyst

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Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURGEMENTS

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Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

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